

1 PHILLIP A. TALBERT  
Acting United States Attorney  
2 PAUL A. HEMESATH  
KEVIN C. KHASIGIAN  
3 Assistant U. S. Attorneys  
501 I Street, Suite 10-100  
4 Sacramento, CA 95814  
Telephone: (916) 554-2700  
5 Attorneys for the United States  
6  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 2019 MERCEDES-BENZ E63 AMG-S, VIN:  
WDDZF8KB8KA608709, CALIFORNIA  
15 LICENSE NUMBER 1UEV351,

16 APPROXIMATELY 0.041836 BITCOIN,

17 APPROXIMATELY 18.12902639 BITCOIN,

18 APPROXIMATELY 26.56443065 BITCOIN,

19 APPROXIMATELY \$1,712,611.00 IN U.S.  
20 CURRENCY,

21 ONE (1) BITCOIN CASASCIUS COIN,

22 ONE (1) CANADIAN GOLD COIN,

23 ONE (1) AMERICAN EAGLE GOLD COIN,

24 ONE (1) CUMMINS ALLISON MONEY  
COUNTER,

25 APPROXIMATELY \$3,050.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1301  
26 MACARTHUR BOULEVARD, OAKLAND,  
CALIFORNIA,

27 APPROXIMATELY \$51,590.00 SEIZED  
28 FROM LAMASSU BTM LOCATED AT 395

2:20-MC-00072-TLN-EFB

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

BIRD AVENUE, SAN JOSE, CALIFORNIA,  
APPROXIMATELY \$2,475.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1310  
BROADWAY, OAKLAND, CALIFORNIA,  
APPROXIMATELY \$1,945.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1305  
N. BASCOM, SAN JOSE, CALIFORNIA,  
APPROXIMATELY \$20,090.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 996  
PINE STREET, SAN FRANCISCO,  
CALIFORNIA,  
APPROXIMATELY \$3,115.00 SEIZED  
FROM LAMASSU BTM LOCATED AT  
25757 SOTO ROAD, HAYWARD,  
CALIFORNIA,  
APPROXIMATELY \$24,890.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 1894  
UNIVERSITY AVENUE, BERKELEY,  
CALIFORNIA,  
APPROXIMATELY \$3,800.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 7500  
COMMERCIAL BOULEVARD, COTATI,  
CALIFORNIA,  
APPROXIMATELY \$3,325.00 SEIZED  
FROM LAMASSU BTM LOCATED AT  
14701 SAN PABLO AVENUE, SAN PABLO,  
CALIFORNIA,  
APPROXIMATELY \$3,785.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 3210  
BUSKIRK AVENUE, PLEASANT HILL,  
CALIFORNIA,  
APPROXIMATELY \$2,835.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 605  
CONTRA COSTA BOULEVARD,  
CONCORD, CALIFORNIA,  
APPROXIMATELY \$6,480.00 SEIZED  
FROM LAMASSU BTM LOCATED AT 860  
ARDEN WAY, SACRAMENTO,  
CALIFORNIA,  
APPROXIMATELY \$22,660.00 SEIZED  
FROM LAMASSU BTM, LOCATED AT  
1151 GALLERIA BOULEVARD,  
ROSEVILLE, CALIFORNIA,

1 APPROXIMATELY \$14,805.00 SEIZED  
2 FROM LAMASSU BTM LOCATED AT 5127  
3 FRANKLIN BOULEVARD, SUITE 1,  
4 SACRAMENTO, CALIFORNIA,

5 APPROXIMATELY \$10,340.00 SEIZED  
6 FROM LAMASSU BTM LOCATED AT 620  
7 W. CHARTER WAY, STOCKTON,  
8 CALIFORNIA,

9 APPROXIMATELY \$6,010.00 SEIZED  
10 FROM LAMASSU BTM LOCATED AT 4709  
11 FLORIN ROAD, SACRAMENTO,  
12 CALIFORNIA,

13 APPROXIMATELY \$6,125.00 SEIZED  
14 FROM LAMASSU BTM LOCATED AT 2221  
15 DEL PASO ROAD, SACRAMENTO,  
16 CALIFORNIA,

17 APPROXIMATELY \$130.00 SEIZED FROM  
18 LAMASSU BTM LOCATED AT 1744 N.  
19 TEXAS STREET, FAIRFIELD,  
20 CALIFORNIA, AND

21 APPROXIMATELY \$5,915.00 SEIZED  
22 FROM LAMASSU BTM LOCATED AT 400  
23 LINCOLN ROAD EAST, VALLEJO,  
24 CALIFORNIA,

25 Defendants.

26 It is hereby stipulated by and between the United States of America and potential claimants  
27 Rehan Alvi and Rubina Alvi (“claimants”), by and through their respective counsel as follows:

28 1. On or about November 26, 2019, the Homeland Security Investigations and Federal  
Bureau of Investigation seized the above-referenced defendant assets pursuant to Federal seizure  
warrants (hereafter collectively “defendant assets”).

2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required  
to send notice to potential claimants, file a complaint for forfeiture against the defendant assets, or  
obtain an indictment alleging that the defendant assets are subject to forfeiture within ninety days of  
seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That  
deadline was April 17, 2020.

3. By Stipulation and Order filed April 1, 2020, the parties stipulated to extend to July 16,  
2020, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
2 forfeiture.

3 4. By Stipulation and Order filed June 25, 2020, the parties stipulated to extend to October  
4 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture against  
5 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
6 forfeiture.

7 5. By Stipulation and Order filed October 14, 2020, the parties stipulated to extend to  
8 December 14, 2020, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
10 to forfeiture.

11 6. By Stipulation and Order filed December 11, 2020, the parties stipulated to extend to  
12 March 15, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
13 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
14 to forfeiture.

15 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May  
16 14, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
17 the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to  
18 forfeiture.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 8. Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment  
3 alleging that the defendant assets are subject to forfeiture shall be extended to May 14, 2021.

4 Dated: 3/15/2021

PHILLIP A. TALBERT  
Acting United States Attorney

6 By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

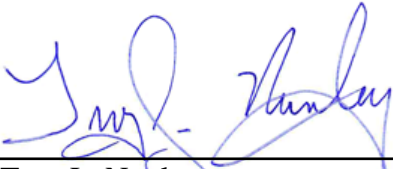
8 Dated: 3/15/2021

/s/ Thomas A. Johnson  
THOMAS A. JOHNSON  
Attorney for Potential Claimants  
Rehan and Rubina Alvi

(Signatures authorized by phone)

12 **IT IS SO ORDERED.**

13 Dated: March 15, 2021

14   
15 Troy L. Nunley  
United States District Judge